

In the Office Action,¹ the Examiner rejected claims 5, 7-16, and 25-28 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,259,405 to Stewart et al. ("Stewart") in view of U.S. Patent No. 6,563,919 to Aravamudhan et al. ("Aravamudhan") and further in view of European Publication No. WO 99/63416 to Turpeinen, Marko ("Turpeinen").

Applicants amend claims 5 and 14. Claims 5 and 7-28 are pending, with claims 17-24 withdrawn from consideration.

Applicants respectfully traverse the rejection of claims 5, 7-16, and 25-28 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Aravamudhan, and further in view of Turpeinen, because a *prima facie* case of obviousness has not been established with respect to these claims. To establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the claim limitations. See M.P.E.P. § 2142, 8th Ed., Rev. 5 (August 2006). Moreover, "in formulating a rejection under 35 U.S.C. § 103(a) based upon a combination of prior art elements, it remains necessary to identify the reason why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed." USPTO Memorandum from Margaret A. Focarino, Deputy Commissioner for Patent Operations, May 3, 2007, page 2.

Here, no *prima facie* case has been established at least for the reason that the prior art, taken individually or in combination, fails to teach or suggest each and every element recited by the claims.

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Independent claim 5, as amended, recites a combination including, for example, a wireless gateway that “generates service request information without the user identifier and without the temporary identifier by excluding the temporary identifier from the communication control information” and “sends the service request information to the service provider” (emphasis added). The Examiner acknowledges that “Stewart in view of Aravamudhan does not disclose the process of sending a request information without the user identifier and without the temporary identifier to the service provider.” Office Action at 5.

Marko fails to cure the deficiencies of Stewart in view of Aravamudhan. The Examiner alleges that “Marko . . . discloses the user identification service provider and a user non-identification service provider and the process of concealing, preventing the user identification from outside, by encrypting the user identifier and/or profile data and sending the request to the service provider.” Office Action at 5. This is incorrect.

Encrypting and transmitting a user identifier, as allegedly disclosed by Marko, does not constitute a teaching or suggestion of “service request information without the user identifier and without the temporary identifier by excluding the temporary identifier from the communication control information,” as recited by claim 5 (emphasis added). Whereas Marko encrypts and transmits a user identifier, claim 5 requires exclusion of the temporary identifier from transmission “to the service provider.” Accordingly, Marko still allows the second server to recognize an identity of the client by simply decrypting the user identifier.

For at least the reason that the prior art, taken individually or in combination, fails to teach or suggest each and every element recited by claim 5, no *prima facie* case of

obviousness has been established for claim 5. Independent claim 14, although of different scope than claim 5, patentably distinguishes from the prior art for at least the same reasons as claim 5. Claims 7-13, 15, 16, and 25-28 depend from independent claims 5 or 14 and therefore include all of the elements recited therein. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 5, 7-16, and 25-28 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Aravamudhan, and further in view of Turpeinen.

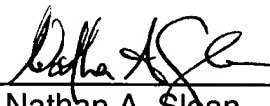
In view of the foregoing remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the claims under examination.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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